

DECLARATION OF GERALD ARMSTRONG

1  
2 I, Gerald Armstrong, having personal knowledge of the  
3 following, hereby declare and state:

4 1. I became involved with Scientology as a customer in  
5 1969 in Vancouver, British Columbia. I worked on staff there  
6 in 1970 and in February 1971 joined the Sea Organization (SO or  
7 Sea Org) in Los Angeles. I was flown to Spain and joined the  
8 Sea Org's flag ship, "Apollo," in Morocco. L. Ron Hubbard, the  
9 Sea Org's "Commodore," was on board and operated Scientology  
10 internationally through the "crew" which numbered, during my  
11 stay on board of four and a half years, around four hundred.  
12 All my staff positions on board involved personal contact with  
13 L. Ron Hubbard, Mary Sue Hubbard, administrative organization  
14 staff and people in the ports and countries the "Apollo"  
15 visited, and included "Ship's Representative" (legal  
16 representative), "Port Captain" (public relations officer), and  
17 "Information Officer" (intelligence officer).

18 2. In the fall of 1975 after the ship operation moved  
19 ashore in Florida I was posted in the Guardian's Office (GO)  
20 Intelligence Bureau connected to Hubbard's Personal Office.  
21 From December 1975 through June 1976 I held the post of Deputy  
22 LRH External Communications Aide, a relay terminal for  
23 Hubbard's written and telex traffic to and from Scientology  
24 organizations. From July 1976 to December 1977 I was assigned,  
25 on Hubbard's order, to the "Rehabilitation Project Force"  
26 (RPF), the SO prison system. In 1978 I worked in Hubbard's  
27 cinematography crew in La Quinta, California, making movies  
28 under his direction until the fall of that year when he again



1 assigned me to the RPF, this time for eight months first in La  
2 Quinta, then at a newly purchased base in Gilman Hot Springs  
3 near Hemet, California. When I got out of the RPF in the  
4 Spring of 1979 and until the beginning of 1980, I worked in  
5 Hubbard's "Household Unit" (HU) at Gilman, the SO unit which  
6 took care of Hubbard's house, personal effects, transport,  
7 meals and so forth, as the "Purchaser," "Renovations In-Charge"  
8 and "Deputy Commanding Officer HU."

9       3. Throughout 1980 and until I left the organization in  
10 December 1981 I held the organization posts in Hubbard's  
11 "Personal Public Relations Bureau" of "LRH Archivist" and "LRH  
12 Personal Researcher." I assembled in Los Angeles an archive of  
13 Hubbard's writings and other materials relating to his history  
14 to be used as, inter alia, the basis for a biography to be  
15 written about the man. I also worked in Los Angeles for the  
16 first few months of 1980 on Mission Corporate Category Sortout  
17 (MCCS), which had the purpose of restructuring the Scientology  
18 enterprise so that Hubbard could continue to control it without  
19 being liable for its actions. Beginning in the fall of 1980  
20 and continuing until my departure, I provided the biographical  
21 writings and other materials, as I collected and organized  
22 them, to Omar Garrison, who had contracted with the  
23 organization to write the Hubbard biography. I interviewed  
24 many people who had known Mr. Hubbard at periods throughout his  
25 life, including almost all of his known living relatives. I  
26 traveled several thousand miles collecting biographical  
27 information and conducting a genealogy search, and arranged the  
28 purchase of a number of collections of Hubbard-related



1 documents and other materials from individual collectors.

2 4. As a result of the activities described above, I have  
3 become very familiar with Scientology policies, practices, and  
4 policy documents. I also know that the Church of Scientology  
5 of California, as part of the Scientology organization, has  
6 followed and implemented these policies and practices,  
7 including those described below.

8 5. Attached to this declaration as Exhibit A is a true  
9 copy of a portion of volume II of The Technical Bulletins of  
10 Dianetics and Scientology, by L. Ron Hubbard, the founder of  
11 Scientology. It includes (at page 157) the following  
12 description of Scientology's practice of using litigation to  
13 harass its opponents:

14 The purpose of the suit is to harass and discourage rather  
15 than to win. [¶] The law can be used very easily to  
16 harass, and enough harassment on somebody who is simply on  
17 the thin edge anyway...will generally be sufficient to  
18 cause his professional decease. If possible, of course,  
19 ruin him utterly.

20 6. Attached to this declaration as Exhibit B is a true  
21 copy of an internal Scientology document, Guardian Order 166,  
22 dated October 7, 1971. This document was written by the then  
23 Guardian, Jane Kember, at that time the most senior Scientology  
24 official under L. Ron Hubbard and his wife, Mary Sue Hubbard.  
25 GO 166 was included in the Intelligence Course Pack which I  
26 studied while I was the Intelligence Officer on Scientology's  
27 ship the "Apollo" in the 1970's. This document includes the  
28 following explanation that Scientology legal strategy in the  
29 U.S. is to use litigation as a financial club:

30 The button used in effecting settlement is purely  
31 financial. In other words, it is more costly to continue  
32 the legal action than to settle in some fashion. ... [¶]



1 Therefore, it is imperative that legal US Dev-T his  
2 opponents and their lawyers with correspondence (a  
3 lawyer's letter costs approx \$50), phone calls (time  
4 costs), interrogatories, depositions and whatever else  
legal can mock up. [¶] One of the bright spots of US  
legal is that even if you lose you don't pay your opponent  
for his lawyers fees.

5 The phrase "Dev-T" is a term which Scientology uses to mean to  
6 cause someone to do unnecessary work.

7 7. Since leaving the Scientology organization, I have  
8 monitored the conduct of the organization, including the Church  
9 of Scientology of California. I am familiar with, and have  
10 been a target and victim of the "fair game" doctrine, which was  
11 described by the California Court of Appeal decisions in Church  
12 of Scientology v. Armstrong, Allard v. Church of Scientology,  
13 and Wollersheim v. Church of Scientology. Although Scientology  
14 claims that the "fair game" doctrine has been abandoned, I know  
15 from personal experience that this is not true, at least as  
16 recently as this year. For instance, Scientology attempted in  
17 the first few months of 1993 to have me jailed for contempt of  
18 court based on the false declaration of a Scientologist lawyer,  
19 Laurie Bartilson, for acts which Scientology itself set up.  
20 This is only the most recent of over a decade of "dirty tricks"  
21 which Scientology personnel have directed at me.

22 8. From my personal experience, I know that Scientology  
23 does use the litigation approach described by Hubbard and  
24 Kember in the quotes above. In various cases, Scientology has  
25 subjected me to over 35 days of depositions. As a paralegal  
26 working on cases involving Scientology for 16 months for Boston  
27 attorney Michael Flynn and for almost two years for California  
28 attorney Ford Greene (to the present), I have observed




1 Scientology's litigation practices. Scientology regularly  
2 attempts to bludgeon the opposition into submission with a  
3 blizzard of meritless paper, motions, depositions, appeals,  
4 writs, Bar complaints, criminal complaints, perjured testimony,  
5 and other improper and abusive tactics.

6 9. I am also aware that Scientology uses an attack  
7 strategy against judges who rule against it, which includes  
8 claims of bias and prejudice and frequently personal attacks.  
9 For instance, in my case, Church of Scientology of California  
10 v. Armstrong, L.A. Superior Court No. C 420153, Scientology  
11 twice tried unsuccessfully to disqualify Judge Breckenridge  
12 from the case because of alleged bias, and levied personal  
13 attacks on him, accusing him publicly of Nazi affiliation.  
14 Similarly, in Aznaran v. Church of Scientology of California,  
15 U.S.D.C. C.D.Cal # CV-88-1786-JMI, Scientology unsuccessfully  
16 attempted to recuse Judge James Ideman because of alleged bias.

17 10. Attached to this declaration as Exhibit C is a true  
18 copy of the June 20, 1984 decision by Judge Paul G.  
19 Breckenridge, Jr., in the case of Church of Scientology of  
20 California v. Gerald Armstrong, L.A. Superior Court No. C  
21 420153, which was affirmed on appeal at 232 Cal.App.3d. 1060,  
22 283 Cal.Rptr. 917 (1991).

23 I declare, under penalty of perjury, that the foregoing is  
24 true and correct.

25 Executed this 4th day of June, 1993, at Oakland,  
26 California.

27   
28 Gerald Armstrong